

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 13-cv-00901-AP

Lori Michelle Cairns,

Plaintiff,

v.

Carolyn W. Colvin, Acting Commissioner of Social Security,

Defendant.

JOINT CASE MANAGEMENT PLAN FOR SOCIAL SECURITY CASES

1. APPEARANCES OF COUNSEL AND *PRO SE* PARTIES

For Plaintiff:

Chris W. Gordon, Esq.
Irwin & Boesen, P.C.
4100 E. Mississippi Ave., 19th Fl.
Denver, CO 80246
(303) 320-1911
Cgordon@coloradolawyers.com

For Defendant:

John F. Walsh
United States Attorney

J. Benedict García
Assistant United States Attorney

Michael A. Thomas
Special Assistant United States Attorney
Social Security Administration
Office of the General Counsel, Region VIII
1961 Stout St., Ste. 04-169
Denver, CO 80294
(303) 844-1190
Michael.A.Thomas@ssa.gov

2. STATEMENT OF LEGAL BASIS FOR SUBJECT MATTER JURISDICTION

The Court has jurisdiction based on section 205(g) of the Social Security Act, 42 U.S.C. 405(g).

3. DATES OF FILING OF RELEVANT PLEADINGS

- A. Date Complaint Was Filed: April 8, 2013**
- B. Date Complaint Was Served on U.S. Attorney's Office: April 23, 2013**
- C. Date Answer and Administrative Record Were Filed: June 20, 2013**

4. STATEMENT REGARDING THE ADEQUACY OF THE RECORD

The parties, to the best of their knowledge, state that the administrative record is complete and accurate.

5. STATEMENT REGARDING ADDITIONAL EVIDENCE

Neither party intends to submit additional evidence.

6. STATEMENT REGARDING WHETHER THIS CASE RAISES UNUSUAL CLAIMS OR DEFENSES

The parties, to the best of their knowledge, do not believe the case raises unusual claims or defenses.

7. OTHER MATTERS

The parties have no other matters to bring to the attention of the Court.

8. BRIEFING SCHEDULE

Due to Defendant's counsel's caseload and schedule, as well as Plaintiff's counsel's schedule, the parties request a briefing schedule outside the standard time frame.

- A. Plaintiff's Opening Brief Due: September 2, 2013**
- B. Defendant's Response Brief Due: October 2, 2013**
- C. Plaintiff's Reply Brief (If Any) Due: October 17, 2013**

9. STATEMENTS REGARDING ORAL ARGUMENT

- A. Plaintiff's Statement: Plaintiff does not request oral argument.**
- B. Defendant's Statement: Defendant does not request oral argument.**

10. CONSENT TO EXERCISE OF JURISDICTION BY MAGISTRATE JUDGE

Indicate below the parties' consent choice.

- A. () All parties have consented to the exercise of jurisdiction of a United States Magistrate Judge.
- B. (x) All parties have not consented to the exercise of jurisdiction of a United States Magistrate Judge.

11. AMENDMENTS TO JOINT CASE MANAGEMENT PLAN

THE PARTIES FILING MOTIONS FOR EXTENSION OF TIME OR CONTINUANCES MUST COMPLY WITH D.C.COLO.LCivR 7.1(C) BY SUBMITTING PROOF THAT A COPY OF THE MOTION HAS BEEN SERVED UPON THE MOVING ATTORNEY'S CLIENT, ALL ATTORNEYS OF RECORD, AND ALL PRO SE PARTIES.

The parties agree that the Joint Case Management Plan may be altered or amended only upon a showing of good cause.

DATED this 10th day of July, 2013.

BY THE COURT:

s/John L. Kane
U.S. DISTRICT COURT JUDGE

APPROVED:

/s/J.J. Fraser, III
J. J. Fraser, III, Esq.
Irwin & Boesen, P.C.
4100 E. Mississippi Ave., 19th Fl.
Denver, CO 80246
(303) 320-1911
jifraser@coloradolawyers.com

Attorney for Plaintiff

UNITED STATES ATTORNEY

/s/Michael A. Thomas
By: Michael A. Thomas
Special Assistant United States Attorney
Social Security Administration
Office of the General Counsel, Region VIII
1961 Stout St., Ste. 04-169
Denver, CO 80294
(303) 844-1190
Michael.A.Thomas@ssa.gov

Attorneys for Defendant